



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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FACT SHEET

**VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY'
DRAFT PERMIT FOR HAZARDOUS WASTE STORAGE
DEPARTMENT OF THE NAVY, NAVAL SURFACE WARFARE CENTER,
DAHLGREN DIVISION
DAHLGREN, VIRGINIA
EPA ID Number VA7170024684**

Draft Permit Prepared for: Naval Surface Warfare Center, Dahlgren Division
17483 Dahlgren Road
Dahlgren, Virginia 22448-5100

Owner/Operator: U. S. Navy

EPA ID Number: VA7170024684

Type of Facility: Hazardous waste storage magazines (HWSMs), which are
Structures 353C, 951, and 952

Introduction:

The Virginia Department of Environmental Quality (DEQ) is proposing to renew a Resource Conservation and Recovery Act (RCRA) permit for the HWSM at Naval Surface Warfare Center, Dahlgren Division (NSWCDD). This fact sheet prepared in accordance with the Virginia Hazardous Waste Management Regulations (VHWMR) 9 VAC –20-60-124 and 40 CRF Part 124, describes the facility, the proposed hazardous waste management activities and the proposed action.

Administrative History:

NSWCDD has, since November 19, 1980, operated a hazardous waste management facility subject to the regulations promulgated under the Resource Conservation and Recovery Act (RCRA). NSWCDD's Hazardous Waste Storage Permit will expire on September 10, 2014. NSWCDD submitted the RCRA Part B of the RCRA renewal application (Part B) on March 10,

2014 and revisions to the Part B were received on April 25, 2014, June 23, 2014, and July 23, 2014. DEQ has reviewed the most recent Part B of the RCRA permit application and found it to be complete and technically adequate. Therefore, pursuant to 9 VAC 20-60-124 and 40 CFR Part 124, the DEQ has prepared a draft permit for the hazardous waste management activities at the facility.

Type of Waste:

NSWCDD serves as one of the principal research, development, testing, and evaluation (RDT&E) centers for US Navy surface ship weapons, ordnance, mines, and strategic systems. NSWCDD generates excess ordnance and other energetic materials during the course of RDT&E activities. These items either have no further military use or have been stressed to a point where they are no longer safe for transport. NSWCDD accepts unserviceable, obsolete, and/or waste military munitions from other Department of Defense (DoD) facilities for treatment. Because these materials exhibit the characteristic of reactivity, they must be managed as Explosive Hazardous Waste (EHW). These units store codes: D001, D003, D005, D006, D007, D008, D009, D011, D030, and D036. This EHW is thermally treated using elevated temperatures as the primary means to change their chemical and physical character. The Thermal treatment units used for this purpose include an Open Burning (OB) unit and Open Detonation (ODD) unit located at the EEA Churchill Range.

Description of Facility:

NSWCDD is located in the Commonwealth of Virginia. NSWCDD is a tenant command at Naval Support Facility Dahlgren (NSFDL) located in the Northern Neck Region of Virginia along the Potomac River, in King George County. NSFDL is 28 miles east of Fredericksburg and 53 miles south of Washington, D.C. NSFDL is bound on the north by US Highway 301 and on the east by the Potomac River. Primary access to NSFDL is via US Highway 301, VA Route 206, and VA Route 614. Controlled access through perimeter fencing to the Mainside is via two entrances. Upper Machodoc Creek flows in a general west-to-east direction through NSFDL, dividing it into two principal areas: Mainside, consisting of 2,673 acres, Mainside is divided by Explosive Experimental Area (EEA) consisting of 1,631 acres, Mainside is divided by Gambo Creek flows in a general north-to-south direction. The EEA located at tetotum Flats, is more commonly referred to as Pumpkin Neck.

The HWSMs consist of three (3) container storage units Structures 353C, 951, and 952. Non-liquid EHW may be stored in Structures 353C, 951, and 952, (permitted magazines) and units that have declared conditionally exempt (CE) storage areas under the Military Munitions Rule (MMR). As aforementioned, EHW stored may be generated offsite by other DoD or local community activities or onsite through RDT&E or other activities. EHW from onsite Installation Restoration (IR) cleanup activities may also require storage until thermally treated.

The purpose of the permitting process is to afford the Virginia Department of Environmental Quality, interested citizens, and other governmental agencies the opportunity to evaluate the ability of the Permittee to comply with the applicable requirements of the Virginia Hazardous Waste Management Regulations (VHWMR). The Draft Permit sets forth in one concise document all of the requirements with which the Permittee must comply during the ten (10) year duration of the Permit.

The public is given forty-five (45) days to review the application and comment on the draft conditions. All persons, including the Permittee, who believe that the tentative decision to grant the Permit is inappropriate, must raise all ascertainable issues and submit all available arguments and factual grounds supporting their position by 11:59 p.m., December 8, 2014. Copies of such comments should be sent to the Department of Environmental Quality, 629 East Main Street, P. O. Box 1105, Richmond, Virginia 23218.

There will not be a public hearing unless there is significant public response, then we may hold a public hearing.

Procedures for Reaching a Final Decision

When making a determination regarding the renewal of a hazardous waste permit to NSWCDD, the Virginia Department of Environmental Quality will consider all written comments received during the comment period, any oral or written statements received during the public hearing, if a hearing is held, and the requirements of Part III of the Virginia Hazardous Waste Management Regulations, and 40 CFR Part 124.

Each person who has submitted comments will receive a written response from the Virginia Department of Environmental Quality. Thereafter, the final permit shall become effective thirty (30) days after the final decision notice. If there are no comments requesting a change in the draft permit, the permit shall become effective immediately upon issuance.

Permit Organization and Conditions:

The permit is divided into four (4) sections as outlined below. The column entitled "Regulation" provides the regulatory authority for the permit conditions.

<u>Section</u>	<u>Topic</u>	<u>Regulation</u>
Part I	Standard Conditions	40 CFR § 270.30 and 40 CFR § 270.32
Part II	General Facility Conditions	40 CFR § 270.14
Part III	Storage in Containers	40 CFR Part 264, 40 CFR § 270.15, and 40 CFR § 270.27
Part V	Corrective Action	40 CFR § 264.101, and 40 CFR § 270.14

Modules I and II of the permit contain conditions, which generally apply to all hazardous waste management facilities. Module III, and IV pertain more specifically to the permitted hazardous waste management operations at NSWCCD facility in Dahlgren, Virginia.

The following seven (7) permit attachments are incorporated into the proposed draft permit by reference. Upon approval of the draft permit, the attachments will be considered enforceable conditions of this permit.

Some of the attachment documents contain excerpts from the Permittee's hazardous waste permit application. Specific language from the permit application has been modified, as deemed necessary, so to be acceptable to the Department.

The proposed permit attachments are specified as follows:

List of Permit Attachments

Attachment AA	Facility Description
Attachment BB	Waste Analysis Plan
Attachment CC	Inspection Schedule
Attachment DD	Security Provisions and Procedures
Attachment EE	Personnel Training

Attachment FF Contingency Plan

Attachment GG Closure Plan

The List of Permit Attachments above provides detailed information associated with the facility's waste analysis plan (WAP), inspection schedules, training, RCRA Contingency Plan, etc., so to assure that sufficient information is available and that appropriate procedures are in place for the proper handling, and storage of wastes at the facility so to avoid or minimize hazards to human health and the environment.

Upon closure of the facility, a Closure Plan is required to be implemented to assure clean closure of the existing hazardous waste management facility.